

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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ANDREW L. COLBORN,

Plaintiff

NETFLIX, INC., et al.,

Defendants.

Case No. 19-CV-484

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**JOINT AND UNOPPOSED CIVIL L.R. 7(h) EXPEDITED  
MOTION TO AMEND SCHEDULING ORDER**

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Plaintiff Andrew L. Colborn and the Producer Defendants, Chrome Media LLC, Laura Ricciardi, and Moira Demos, by their undersigned counsel, with the non-opposition of Netflix, jointly move the Court for amendment of the Scheduling Order deadlines, pursuant to Federal Rule of Civil Procedure 16(b)(4) and Civil Local Rule 7(h), to the dates set forth in the proposed Amended Scheduling Order that is being submitted separately by email in conjunction with the motion. In support of this motion, Plaintiff and the Producer Defendants state as follows:

1. The parties have already engaged in extensive written discovery, have made a number of document productions, have served final discovery requests on opposing parties, have served several third-party document subpoenas, and are in the process of reviewing and producing additional documents. They have begun to schedule depositions, specifically including depositions of two Netflix employees and of the Producer Defendants in April 2022.
2. The parties are currently engaged in meet-and-confer processes regarding Plaintiff's discovery responses, which Defendants contend may result in motion practice if the parties cannot resolve all of their differences. In light of the additional weeks it would take to brief motions, receive rulings on those motions,

produce documents to the extent ordered by the Court, and review those documents, a further extension would be necessary to ensure adequate preparation for the deposition of Plaintiff Andrew Colborn. Counsel for Plaintiff and the Producer Defendants also have had unavoidable conflicts in late March to early April 2022 that have prolonged the meet-and-confer process.

3. On February 22, 2022, the Court granted the Plaintiff's unopposed motion to amend the scheduling order, setting the current dates. Dkt. No. 205.
4. The proposed amendments to the Scheduling Order provide for a brief extension (approximately 12 weeks) of the deadline for conducting the deposition of Plaintiff Andrew Colborn. The amendments similarly extend the deadlines by the same approximate 12 weeks for events occurring after the close of fact discovery, such as expert discovery and dispositive motion deadlines.
5. There is good cause to extend the deadlines as proposed because it would afford the parties more time to accommodate scheduling of depositions with due consideration for multiple attorneys' involvement, the possibility of motion practice and the orderly progress of this case, and the schedules of the witnesses.
6. I am authorized to represent that Netflix does not oppose this motion.

Dated: March 29, 2022

Respectfully submitted,

s/ April Rockstead Barker (with authorization)

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Dated: March 29, 2021

Respectfully submitted,  
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